

Energy - Docket Optical System

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Subject: FW: RE Map
Attachments: RenewableEnergyProjectsUpdate042014.pdf; 01
_Online_Approved_Current_Peakers_Nonpeakers.pdf; AllSolar2014.xls; BLM Wind
Applications & Authorizations .xlsx

Categories: Follow-up

Re: Docket# 14-IEP-1C - NOTICE OF LEAD COMMISSIONER (8-5-14) WORKSHOP ON INTEGRATING ENVIRONMENTAL INFORMATION IN RENEWABLE ENERGY PLANNING PROCESSES

Position statements of the Lucerne Valley Economic Development Association (LVEDA)

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HERE'S THE PROBLEM WITH THE CURRENT STATUS:

The first attachment is a map (first one ever) of ALL solar/wind/transmission projects filed as of March 2014 - within BLM, County, State Lands Commission and CPUC jurisdictions – within Mojave Water Agency boundaries. (It is a 'living map' that will be updated every 6 months or so). The third attachment is the list of projects and status shown at the bottom of the map. The second attachment is a listing of all Calif. Energy Commission (CEC) projects. The fourth is a list of potential wind projects on BLM.

Hopefully every agency can print and post all of these as a reminder of what's before us – the stories they tell – all of us dealing with them in one way or another – before the draft DRECP is published – before the County's Renewable Element to the General Plan will be available in a year or so – with the County's solar project moratorium rescinded – with its Solar Ordinance not fully tested – **BOTTOM LINE:**
Before we have adequately planned for all this stuff.

We all need and enjoy the benefits of electricity and its transmission. SCE's job is to keep the lights on. Renewable Energy is a neat idea – with wind (but mostly) solar as a potential significant generator in our desert setting. We also have a unique environment, land-use character, custom and culture that would be adversely affected by even some of these projects – with the integrity of our communities being diluted if not destroyed.

The two PV projects in Lucerne Valley – (Agincourt and Marathon – now Lone Valley Solar) - approved under the County’s system before its current ordinance – are under construction. They went through 10 acre feet of construction water from the Morongo Pipeline’s untreated State water – now getting truckloads after truckloads from a local source over 6 miles away (spewing out a lot of CO2) – and could end up using over 40 acre feet – potable water from an overdrafted, adjudicated basin. And with all that water use - during recent winds – the plume of flying dirt reached miles from the sites. Complaints took up a lot of County Code Enforcement’s and the Mojave Air Quality Management District’s time. The Soltec PV in Newberry Springs somehow morphed from an approved, low profile panels into huge panels over 40’ high – with no apparent re-notification of surrounding residents – and also is subject to blowing sand from destabilized soils - which again instigated complaints. If we don’t get smart about such projects and get serious about adopting/enforcing binding conditions of approval – County Code Enf. and MDAQMD will end up inheriting these projects – both with limited staffs and budgets. These projects got a Power Purchase Agreement with SCE – beyond that – the two in Lucerne Valley requiring tremendous amount of grading – destruction of Joshua Trees and Yuccas – major flood control work – major water consumption - and the one in Newberry Springs with its sand-blow problem and major project revision – are only good for being ‘poster boy’ examples of what NOT to do. We have to get smarter.

Take a good look at the attached map and see what other damage could be done before we get our collective act together.

SCE’s Coolwater/Lugo Transmission Line proposal, and its proposed Desert View Substation in Apple Valley - currently before the CPUC - has sparked numerous meetings, protests, letters of opposition, etc. Its application to the CPUC states” “The BarstowLucerne Valley.....areas have been identified to be rich solar and wind resource areas.....The purpose of the Proposed Project is to provide additional transmission capacity needed in theLucerne Valley areas to support large-scale renewable generation development.....”

Said statement likely references the draft DRECP’s Development Focus Areas (DFAs) – totally engulfing and surrounding Lucerne Valley and other communities in all 6 alternatives – formulated with no local stakeholder participation – inferring that solar/wind all over the place is a “done deal”. It’s not! The potential MW generation that SCE cites in its application is too speculative and locally opposed to constitute rationale for this transmission project – with some of the proposed RE projects still ‘in study’ - or withdrawn, ‘on hold’, not economically viable, etc. As such – if the potential for “renewable” generation in Lucerne Valley is one of the primary reasons for this transmission project – it is based on a failed premise -not much will come from here – thus SCE and PUC need to re-think the need for and benefit of this project.

We are working with the County to identify a suitable area in Lucerne Valley for industrial-scale PV that meets reasonable and functional siting constraints – an area about 2% of that identified in the draft DRECP – with our strong position contrary to the project description’s inference that we are a wide-open space – “available for these things”. We won’t be.

Per our meetings, tours and numerous communications: SCE staff, CEC Commissioners, the Governor’s Office and San Bernardino County officials are well aware of our community’s adamant rejection of said DFAs – our opposition to utility scale solar or wind projects, particularly where they conflict with existing and projected land-uses - providing no real economic benefit – our major concerns re: surrounding property devaluations – our emphasis for and support of “point of use” (Distributed Generation - DG) rooftop/parking lot/backyard PV.

Parking lot/rooftop DG generation needs to be included and accounted for in the State’s and SCE’s 33% RE quota (likely increasing) – not just industrial scale MWs - alleviating the need for additional long-distance transmission lines, their costs and known energy losses. DG doesn’t tear up native desert ground – doesn’t result in erosion/blowing dirt – isn’t a blight on the landscape – certainly provides more LOCAL jobs than do industrial scale projects – and even with various subsidies – provides more property tax revenue than exempt industrial systems – and its presence in a community would promote more incentive for localized installations.

We are all aware that these projects involve ‘willing buyers/willing sellers’ – that landowners/applicants have certain rights to the use of their properties – that BLM and the County are obligated to process said applications. HOWEVER, approvals of even a few of these projects will dictate where other projects go – bastardizing the pending plans in the process – wasting the \$700k the County got for the RE Element.

If the Coolwater/Lugo transmission line is approved prior to completion and adoption of all these pending plans – it will either trump said plans or unduly influence them – because by virtue of its existence, alignment and substations - it will determine where industrial scale renewables are sited – where PPA’s will be the easiest to obtain – at the expense of what was intended to be good, regional planning - just more tails wagging the dog.

The CPUC should shelve SCE’s application. The County and BLM should put all pending projects ‘on hold’ - at least until regional RE plans are completed. The State’s draft DRECP (an ‘energy plan’ - certainly not a ‘conservation plan’) is due sometime this summer. BLM’s West Mojave Plan update isn’t completed yet. San Bernardino County’s Renewable Element to the General Plan (and community zones for industrial scale projects) won’t be in draft form for probably more than a year. We are dealing with too many individual projects – too many ‘parts’ before we understand the consequences of the ‘whole’ – a systemic, dysfunctional series of reactions with no

real PLAN to guide us – to determine the best places for this stuff with the least environmental/land-use/social damage.

SO: How about the County, BLM, CEC, CPUC, SCE and community representatives have a meeting to determine the best way to deal with all this stuff prior to the pending plans being finalized – before we lose our best options and an opportunity for good land-use planning? We will help you set it up.

**FOLLOWING ARE SOME THOUGHTS ON ‘ENVIRONMENTAL PLANNING’
(generic – not just for our community):**

**SITING CRITERIA/CONDITIONS OF APPROVAL FOR INDUSTRIAL-SCALE “RENEWABLE ENERGY” PROJECTS ON PRIVATE LANDS
LUCERNE VALLEY – SAN BERNARDINO COUNTY**

SB County amend/update its General Plan – Development Code – Community Plans, etc. with zoning and criteria for applications/approvals.

Acknowledge that the acreage requirement per solar/wind MW is a marginal tradeoff of desert resources within the total mix of energy options.

Adopt policy: Utilize rooftops - commercial parking lots with solar (DG) - where necessary infrastructure exists - (which alone should be sufficient to meet "renewable goals") - before considering the use of the Plan's "zoned" lands.

Strong opposition to utility-scale **wind** projects – too heavily subsidized – view shed obtrusive – inefficient generation of power relative to other sources - harm to raptors/eagles/etc. - long transmission lines/new corridors over and around hills – intermittent power from wind that is difficult for the grid to accept/lost generation - etc.

Advocate County’s implementation of AB 811.

Economic concerns:

- Loss of property values in vicinity of the projects
- Benefits/lack of jobs for Lucerne Valley (temporary & permanent)
- Tax benefits/detriments for the community

- We are in an adjudicated groundwater basin. Overproduction of allotted water and how it could affect local water purveyors (mutual water companies) as to their ability to procure unused allotment to meet their own overproduction that meets the needs of the valley's residents
- Government subsidies for solar/wind – our tax \$s adversely affecting our community.
- Loss of agricultural lands for production, zoning concerns for future agricultural uses
- Conflicts with existing/future, more economically viable development – areas of regular events, etc.

Development concerns:

- The siting of such developments in areas of residential uses
- The obscuring of view sheds
- Additional infrastructure on and off site (transmission lines, etc)
- Use of land that has a better future potential (zoning)
- Mitigation of construction related disruptions
- Ground/habitat disturbance and future dust creation
- Water consumption for construction and operation

Siting Criteria and Conditions of Approval:

NOTE: Lucerne Valley's 4 square mile "Industrial-Scale PV Suitable Area" is delineated on the attached map – *our only location that meets the following criteria.*

Avoid locations where current economically beneficial (job-producing) land uses or periodic events would be adversely affected.

No solar thermal due to size and water requirements.

No PV fixed systems over 8' in height - no tracking systems over 8' in height when stowed.

Confine PV to within 2 miles of existing transmission corridors. Project-required lines connecting to existing lines or existing/new substations to be within established corridors or not adversely affect improved parcels.

Notify residents/landowners of all applications within a 2 mile radius – (desert viewsheds and noise levels extend for miles). Consult up-gradient residences when considering parcels that constitute their significant view shed.

County post all applications received in the local newspaper.

**Note: This only applies in a situation where residential use is sparse and PV is agreeable to said residents.* Require larger than required setbacks from property lines when near (within 700 feet) of residential areas on the following scale; add an additional 20 feet to the minimum setback as per the County Development Code for every 10 additional acres over 20 acres (ie; add 20' for 30 acres, etc.) up to a maximum of 100 feet of additional setback.

Plan all construction traffic around the main community corridors.

Min. 1000' setback from a "scenic" state highway – additional footage per * above.

Enforce a ground disturbance plan to control soil erosion/sand blow/weeds in and around the solar structures – no adverse effects on surrounding properties. Mowing is significantly preferable over grading/de-brushing – and beneficial to developer to avoid future wind erosion and complaints triggering code enforcement. Install parallel sand fencing on sites with (wind) erodible soils.

No soil disturbance during typical windy (desert) months – January to June.

Renewable energy installations should be located on flat terrain so as not to interfere with floodwater runoff and to reduce grading requirements.

Select relatively flat sites that do not require mass grading – soil disturbance only in increments.

Zone only those lands with minimal native vegetation and habitat. (Utilize fallowed ag. land/disturbed parcels with minimal biological/drainage/etc. impacts).

Industrial-scale PV should be naturally screened by native vegetation that will survive without supplemental water after the first/second year – or developed in an area currently containing buffering plants/trees – ie: natives, tamarisk, etc.

Full mitigation for construction/operation-related impacts.

All required infrastructure to be funded by developer.

Water for construction from **non-potable** sources.

Local hiring for construction and operation.

Project applicants provide an "economic impact report" to include property value impact, number of temporary jobs for LV residents, permanent jobs for LV residents, tax and other new revenues that will directly benefit LV - disclosing every expected

economic impact – positive and negative – performed by a third party, reputable entity with experience in energy project-related economic analysis.

Require applicant to **post a bond** sufficient to demolish the project at the end of its productive life and to reclaim the landscape and terrain to a specified condition. (Require detailed photos and survey info re: a site's condition prior to development). If a solar or wind installation ceases to produce an agreed upon minimum output over an agreed upon time, it shall be decommissioned, demolished, and not be allowed to remain indefinitely as an eyesore that produces just a token output, delaying its demise.